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**UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF PUERTO RICO** 25

CLERK'S OFFICE
U.S. DISTRICT COURT
SAN JUAN, P.R.

LUIS R. RODRIGUEZ-BENITEZ
Petitioner

vs.

CASE NO. 99 CR 332-02(DRD)

UNITED STATES OF AMERICA
Respondent

**MOTION FOR MODIFICATION OF SUPERVISED
RELEASE IN EX-PARTE PURSUANT TO
TITLE 18 U.S.C.A. 3583 (e)(1)**

COMES NOW, Luis R. Rodríguez-Benítez, the Petitioner, pro-se, respectfully to this Honorable Court, in ex parte with this Motion for Modification of Supervised Release pursuant to Title 18 U.S.C.A. 3583 (e)(1).

STATEMENT OF FACTS

On December 15, 2000, the petitioner was sentenced to sixty-eight (68) months imprisonment and four (4) years of supervised release by the Honorable Judge Daniel R. Dominguez, for violation of Title 21 U.S.C.A. 846.

The relevant statute provides that the Court may, after considering the factors set forth in Section 3583 (a)(1), (a)(2)(c), (a)(4), (a)(5) and (a)(6), terminate a term of supervised release and discharge the defendant released at any time after the expiration of one (1) year of supervision, pursuant to the provisions of the Federal Rules of Criminal Procedure, relating to the modification of probation, if it is satisfied that such action is warranted by the conduct of the defendant released and in the interest of justice.

The petitioner, Luis R. Rodríguez-Benítez, has completed forty-two (42) months of supervision with no unfavorable reports.

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The petitioner avers that since his release, he has maintained a stable home environment, currently living with his wife and two (2) children; has been gainfully employed since his release as an Engineering Supervisor at the San Juan Water & Beach Club Hotel and presently, as the Engineering Supervisor at the El Convento Hotel in San Juan, Puerto Rico. Petitioner was nominated as Employee of the Month in July 2006, and selected Employee of the Month in August 2006 (Appendix A). He has provided community services by coaching a Little League baseball team (Cachorros Baseball Club) at the Juan Almeyda Baseball League, Guaynabo, Puerto Rico. In addition, Petitioner was recognized for his volunteer services by the Antilles Intermediate School at the Fort Buchanan Army Base in Guaynabo, Puerto Rico (Appendix B). Petitioner has also continued his program of recovery as an active member of Narcotics Anonymous, maintaining drug-free. Since his release the petitioner has not had any other incidents with the law and has been in full compliance with the terms and conditions of his supervision, and has become an accepted, responsible and productive member of society.

The exemplary representation of petitioner's rehabilitation at home, work, the community and responsibilities with his supervised release, the public interest is best served by terminating the term imposed for supervised release, which will allow the U.S. Probation Office to invest their resources on those who are in need of supervision.

Luis R. Rodríguez-Benítez, Petitioner

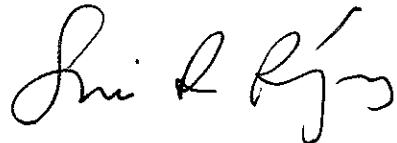
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WHEREFORE, the petitioner prays that this Honorable Court terminate petitioner's term of Supervised Release pursuant to it's discretionary authority under Title 18 U.S.C.A. 3583 (e)(1).

Respectfully submitted,



Luis R. Rodríguez-Benítez
Petitioner

Office of the Clerk
United States District Court for the
District of Puerto Rico
Federal Office Building
150 Carlos Chardon Avenue
San Juan, Puerto Rico 00918

U.S. Attorney's Office
U.S. District Court for the
District of Puerto Rico
Federal Office Building
150 Carlos Chardon Avenue
San Juan, Puerto Rico 00918

U.S. Probation Office
Federal Office Building
Room 400
150 Carlos Chardon Avenue
San Juan, Puerto Rico 00918